

HARRIS

ST. LAURENT

WECHSLER

November 4, 2022

**By ECF**

Hon. Loretta A. Preska  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: United States v. Ishan Wahi, 22-cr-392 (S.D.N.Y.)

Your Honor:

I am one of the lawyers representing defendant Ishan Wahi in this case. I write to respectfully request that the Court permit counsel to make color photocopies of Mr. Wahi's passport that Mr. Wahi needs for his personal affairs.

As part of the conditions of release that the Court set for Mr. Wahi on August 3, 2022, Mr. Wahi was required to surrender his travel documents, including his passport. Mr. Wahi did surrender that passport, which is now in the possession of United States Pretrial Services for the Southern District of New York ("Pretrial Services"). Pretrial Services informs that it has a color photocopier at its offices that defense counsel can use to make the required copies and that the passport need not leave Pretrial Services for the required copies to be made. The passport would be returned immediately to Pretrial Services after the copies were made.

The government (AUSA Noah Solowiejczyk) consents to this request. Pretrial Services (BIOS Lea Harmon) consents to this request.

We would respectfully request that the Court grant Mr. Wahi the brief access to his passport described herein.

Respectfully,



Andrew St. Laurent

cc: AUSA Noah Solowiejczyk (by ECF)  
AUSA Nicolas Roos (by ECF)  
David Miller, Esq. (by ECF)